

1 **LOWENSTEIN SANDLER LLP**  
2 JEFFREY D. PROL (*pro hac vice*)  
3 [jprol@lowenstein.com](mailto:jprol@lowenstein.com)  
4 BRENT WEISENBERG (*pro hac vice*)  
5 [bweisenberg@lowenstein.com](mailto:bweisenberg@lowenstein.com)  
6 One Lowenstein Drive  
7 Roseland, New Jersey 07068  
8 Telephone: (973) 597-2500  
9 Facsimile: (973) 597-2400

**KELLER BENVENUTTI KIM LLP**  
TOBIAS S. KELLER (Cal. Bar No. 151445)  
[tkeller@kbklp.com](mailto:tkeller@kbklp.com)  
JANE KIM (Cal. Bar No. 298192)  
[jkim@kbklp.com](mailto:jkim@kbklp.com)  
GABRIELLE L. ALBERT (Cal. Bar No.  
190895)  
[galbert@kbklp.com](mailto:galbert@kbklp.com)  
101 Montgomery Street, Suite 1950  
San Francisco, CA 94104  
Telephone: (415) 496-6723  
Facsimile: (650) 636-9251

8 **BURNS BAIR LLP**  
9 TIMOTHY W. BURNS (*pro hac vice*)  
10 [tburns@burnsbair.com](mailto:tburns@burnsbair.com)  
11 JESSE J. BAIR (*pro hac vice*)  
12 [jbair@burnsbair.com](mailto:jbair@burnsbair.com)  
13 10 East Doty Street, Suite 600  
14 Madison, Wisconsin 53703-3392  
15 Telephone: (608) 286-2808

13 **UNITED STATES BANKRUPTCY COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **OAKLAND DIVISION**

17 *In re:*

18 THE ROMAN CATHOLIC BISHOP OF  
19 OAKLAND, a California corporation sole,  
20 Debtor.

Case No. 23-40523 WJL

Chapter 11

**DECLARATION OF GABRIELLE L.  
ALBERT IN SUPPORT OF RENEWED  
MOTION OF THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS TO LIFT THE  
AUTOMATIC STAY TO PERMIT  
CERTAIN PLAINTIFFS' PERSONAL  
INJURY CLAIMS TO PROCEED IN  
STATE COURT**

Judge: Hon. William J. Lafferty

Date: July 16, 2025

Time: 1:00 p.m. (Pacific Time)

Place: United States Bankruptcy Court  
1300 Clay Street, Courtroom 220  
Oakland, CA 94612

1 I, Gabrielle L. Albert, hereby declare pursuant to 28 U.S.C. § 1746:

2 1. I am an attorney with the firm Keller Benvenuti Kim LLP, a law firm with offices  
3 at 101 Montgomery Street, Suite 1950, San Francisco, California 94104, counsel to The Official  
4 Committee of Unsecured Creditors (the “**Committee**”) of the Roman Catholic Bishop of Oakland  
5 (the “**Debtors**”).

6 2. Unless otherwise stated in this Declaration, I have personal knowledge of the facts  
7 set forth herein and could and would testify competently thereto.

8 3. I submit this declaration in support of the *Renewed Motion of the Official*  
9 *Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs’*  
10 *Personal Injury Claim* (the “**Motion**”).<sup>1</sup>

11 4. Attached hereto as **Exhibit 1** is a true and correct copy of the *Motion of the Official*  
12 *Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs’*  
13 *Personal Injury Claims to Proceed in State Court* [Dkt. No. 1460].

14 5. Attached hereto as **Exhibit 2** is a true and correct copy of the Reporter’s Transcript  
15 of Proceedings held on January 21, 2025, in this Chapter 11 Case [Dkt. No. 1667].

16 6. Attached hereto as **Exhibit 3** is a true and correct copy of the Reporter’s Transcript  
17 of Proceedings held on January 15, 2025, in this Chapter 11 Case [Dkt. No. 1645].

18 7. Attached hereto as **Exhibit 4** is a true and correct copy of the Reporter’s Transcript  
19 of Proceedings held on May 28, 2025, in *In re N. Calif. Clergy Cases*, No. JCCP5108, Superior  
20 Court of the State of California, County of Alameda.

21 8. Attached hereto as **Exhibit 5** is a true and correct copy of the *Order on Criteria for*  
22 *Bellwether Cases, In re Northern California Clergy Cases*, No. JCCP 5108, Superior Court of the  
23 State of California, County of Alameda, November 18, 2022.

24 9. Attached hereto as **Exhibit 6** is a true and correct copy of *Memorandum Decision*  
25 *on Motion for Relief from Stay, In re Roman Cath. Archbishop of S.F.*, No. 23-30564-DM,  
26 Dkt. No. 1138, (Bankr. N.D. Cal. Apr. 10, 2025).

27 \_\_\_\_\_  
28 <sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to  
them in the Motion.

10. Attached hereto as **Exhibit 7** is a true and correct copy the transcript of hearing, *In re Roman Cath. Diocese of Albany, N.Y.*, No. 23-10244, Dkt. No. 1546, (Bankr. N.D.N.Y. March 12, 2025).

11. Attached hereto as **Exhibit 8** is a true and correct copy of the Reporter's Transcript of Proceedings held on April 1, 2025, in *In re Franciscan Friars of Cal., Inc.*, No. 23-41723, Dkt. No. 876 (Bankr. N.D. Cal.).

12. Attached hereto as **Exhibit 9** is a true and correct copy of the Reporter's Transcript of Proceedings held on December 18, 2024, in this Chapter 11 Case [Dkt. No. 1568].

I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct. Executed this twenty-fifth day of June, 2025.

/s/ Gabrielle L. Albert

Gabrielle L. Albert